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*Counsel for the Raymond Sackler Family*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

**DECLARATION OF CARL J. TROMPETTA**

Under 28 U.S.C. § 1746, I, CARL J. TROMPETTA, declare under the penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

1. I am Secretary at TXP Services Inc. (“**TXP**”), a Delaware company that is beneficially owned by members of the Raymond Sackler family and the Mortimer Sackler family. I have held that position since 2007. TXP provides tax services for certain Debtors, including Purdue Pharma, L.P. (“**PPLP**”) and a number of certain other entities beneficially owned indirectly by members of the Raymond Sackler family and the Mortimer Sackler family, including Pharmaceutical Research Associates, L.P. (“**PRALP**”).

2. I have been a certified public accountant since 1996, and in 2012 received a Master of Science in Taxation from Fairfield University.

3. Prior to my position at TXP, I was employed by PPLP, where I was Senior Manager with responsibility for tax planning until transitioning to TXP. I was employed at PPLP from 1991 until the end of 2007.

4. Based on my work at TXP, I am familiar with tax related issues concerning PPLP and PRALP for the period 2010 to 2019. I was personally involved in the preparation of PRALP’s tax returns for that period. During that period, PPLP was considered a disregarded entity for tax purposes, and its income (or losses) were reported on the partnership tax returns of PRALP (formerly known as Purdue Holdings L.P.).

5. For the period 2010 to 2019, PRALP filed tax returns which reflected PPLP’s taxable income and also PRALP’s taxable income (or losses) from other sources.

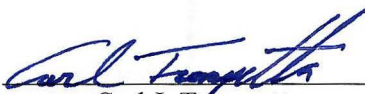
6. Below is a chart I prepared based upon the PRALP tax returns and my personal knowledge showing the amount of PPLP’s taxable income for 2010-2019 compared to the PRALP’s taxable income in the same period. The difference between the PPLP’s taxable income and the taxable income of PRALP over that period is largely attributed to PRALP’s losses in non-PPLP investments. In short, because PPLP’s income was offset by partnership

losses over the same period, PPLP's taxable income was lower than it would have been had it not been a disregarded entity and part of the PRALP partnership.

PPLP v PRALP Taxable Income 2010-2019			
Year	PPLP Taxable Income	PRALP Taxable Income	
2019	\$ 7,841,392	\$	(118,035,249)
2018	\$ 138,861,039	\$	(21,022,929)
2017	\$ 307,637,143	\$	53,224,532
2016	\$ 614,411,659	\$	466,903,310
2015	\$ 978,336,324	\$	857,014,498
2014	\$ 1,050,276,217	\$	947,189,480
2013	\$ 972,440,526	\$	861,590,210
2012	\$ 1,277,902,049	\$	1,180,527,201
2011	\$ 1,369,259,611	\$	1,325,487,884
2010	\$ 1,674,049,391	\$	1,612,736,894
Total	\$ 8,391,015,351	\$	7,165,615,831
		Difference	\$ 1,225,399,520

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 26, 2021

  
Carl J. Trompetta